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*Co-Lead Class Counsel for Indirect-Purchaser  
Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL)  
ANTITRUST LITIGATION

No. 3:07-md-1827  
MDL No. 1827

This Document Relates To:  
ALL INDIRECT-PURCHASER ACTIONS

**STIPULATION AND [PROPOSED]  
ORDER REGARDING  
AMENDMENT TO INDIRECT-  
PURCHASER PLAINTIFFS'  
SECOND CONSOLIDATED  
AMENDED COMPLAINT**

Judge: Honorable Susan Y. Illston  
Crtrm: 10, 19<sup>th</sup> Floor

TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:

IT IS HEREBY STIPULATED by and between the parties, INDIRECT PURCHASER  
PLAINTIFFS, and EPSON IMAGING DEVICES CORPORATION (collectively "the Parties")  
and their respective counsel, and subject to the approval of the Court, that Indirect-Purchaser

1 Plaintiffs' Second Consolidated Amended Complaint ("Complaint"), filed December 5, 2008  
 2 (Dkt. No. 746), be deemed amended as follows.

3 1. New Paragraph 95A shall state: "Defendant Epson Imaging Devices Corporation  
 4 ("EID") is a Japanese Company with its principal place of business in Tottori, Japan. EID was  
 5 originally formed as Sanyo Epson Imaging Devices Corporation on October 1, 2004 as a joint  
 6 venture co-owned by Seiko Epson Corporation and Sanyo Electric Co., Ltd. As of December 28,  
 7 2006, Sanyo Epson Imaging Devices Corporation became a wholly-owned subsidiary of Seiko  
 8 Epson Corporation and changed its name to EID. During the Class Period EID manufactured,  
 9 sold and/or distributed LCD panels to customers throughout the United States."

10 2. Paragraph 98 is amended to delete the reference to "Epson Imaging Devices  
 11 Corporation."

12 3. All references to "defendants" in the Complaint, except as the term is used to  
 13 describe a specifically-named defendant or defendants other than EID, shall be deemed to include  
 14 EID.

15  
 16 Dated: June 21, 2010

FRANCIS O. SCARPULLA  
 ZELLE HOFMANN VOELBEL  
 & MASON LLP

18 JOSEPH M. ALIOTO  
 19 THE ALIOTO LAW FIRM

20  
 21 By: /s/ Francis O. Scarpulla  
 Francis O. Scarpulla

22 *Co-Lead Class Counsel for Indirect-*  
 23 *Purchaser Plaintiffs*

1 Dated: June 21, 2010

MELVIN R. GOLDMAN  
STEPHEN P. FRECCERO  
DEREK F. FORAN  
MORRISON & FOERSTER LLP

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5 By: /s/ Stephen P. Freccero  
Stephen P. Freccero

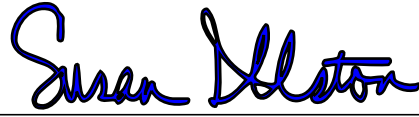
6 *Attorneys for Counsel for Defendants*  
7 *Seiko Epson Corporation; Epson*  
8 *Imaging Devices Corporation; Epson*  
9 *Electronics America, Inc.*

10 Attestation: Pursuant to General Order No. 45, the filer attests that concurrence in the filing of  
11 this document has been obtained from each of the signatories.  
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1 **[PROPOSED] ORDER**

2 Pursuant to the stipulation of the parties, IT IS SO ORDERED.

3  
4 Dated: \_\_\_\_\_



5 HONORABLE SUSAN ILLSTON  
6 United States District Judge  
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